



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

July 15, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: Polygon Company, 141-17452-00062
Office of Air Quality

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

FNPERAM.wpd 8/21/02

July 15, 2003

Mr. Jao Chang
Polygon Company
P. O. Box 176
Walkerton, IN 46574

Re: 141-17452
Second Administrative Amendment to
Part 70 141-10871-00062

Dear Mr. Chang:

Polygon Company was issued a Part 70 permit on April 18, 2001, for a stationary fiberglass reinforced plastic tubing manufacturing source. A letter requesting an administrative amendment was received on June 19, 2003. The changes requested are related to the addition of eight (8) rubber encapsulated fiberglass strand manufacturing lines and removal of two (2) existing pultrusion lines. The potential to emit of criteria pollutants from the eight (8) new lines are negligible. According to 326 IAC 2-7-11(a)(7), an administrative amendment can be used for a modification that "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". The requested changes meet the above requirement, therefore, pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Section A.3 is amended as follows:

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Industrial Park Drive Plant

- (a) ~~Nine (9)~~ **Seven (7)** pultrusion lines, identified as PL1 through PL**9 7**, constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.
- (b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.

(2) Section A.4 is amended as follows:

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
-
- (i) Research and Development operations - which will produce parts for new product testing and marketing research samples for a potential new product designated as continuous fiber thermoplastic (CFT).
- (j) **Eight (8) rubber encapsulated fiberglass strand manufacturing lines, with emissions below exemptions levels as defined in 326 IAC 2-1.1-3.**

(3) Section D.1 is amended as follows:

Facility Description [326 IAC 2-7-5(15)]: Fiberglass Reinforced Plastics Operations

Industrial Park Drive Plant

- (a) ~~Nine (9)~~ **Seven (7)** pultrusion lines, identified as PL1 through PL9 **7**, constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.
- (b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm

cc: File - St. Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Polygon Company
103 Industrial Park Drive
Walkerton, Indiana 46574**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 141-10871-00062	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 18, 2001

1st Administrative Amendment No.: 141-14574

Issuance Date: December 21, 2001

2 nd Administrative Amendment No.: 141-17452	Pages Affected : 5, 6a, 25
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 15, 2003

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass reinforced plastic tubing manufacturing source.

Responsible Official:	Charles Mitchell
Source Address:	103 Industrial Park Drive, Walkerton, Indiana 46574
Mailing Address:	P.O. Box 176, Walkerton, Indiana 46574
Phone Number:	219 - 586 - 3145
SIC Code:	3089
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This fiberglass reinforced plastic tubing manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 103 Industrial Park Drive, Walkerton, Indiana 46574; and
- (b) Plant 2 is located on Tennessee Street, Walkerton, Indiana 46574.

Because the two (2) plants are owned by one (1) company, are adjacent (0.25 miles apart), have the same SIC codes, and because all products manufactured at Plant 2 are transferred to Plant 1 for final fabrication, they will be considered one (1) source. In addition, both plants were submitted in a single Part 70 application.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Industrial Park Drive Plant

- (a) Seven (7) pultrusion lines, identified as PL1 through PL7, constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.

- (b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.
- (c) One (1) gel coat spray booth, identified as B2, constructed in 1998, for the surface

Polygon Company
Walkerton, Indiana
Permit Reviewer: PTB/MES

2nd Administrative Amendment No.: 141-17452
Amended By: Madhurima D. Moulik

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- (j) Eight (8) rubber encapsulated fiberglass strand manufacturing lines, with emissions below exemptions levels as defined in 326 IAC 2-1.1-3.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Fiberglass Reinforced Plastics Operations

Industrial Park Drive Plant

- (a) Seven (7) pultrusion lines, identified as PL1 through PL7, constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.
- (b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.
- (c) One (1) gel coat spray booth, identified as B2, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity of 53.5 pounds per hour, equipped with dry filters for air pollution control, and exhausting to stacks V7 and V8.
- (d) One (1) filament winding area, identified as F2, constructed in 1998, with a maximum capacity of 47.0 pounds per hour, emissions are fugitive.

Tennessee Street Plant

- (e) Nine (9) resin dip tanks, identified as RD1 through RD9, constructed in 1997, with a maximum capacity of 95.0 pounds per hour, exhausting to stack V6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] Pultrusion Lines

Use of resins and solvents shall be limited such that the potential to emit (PTE) of Volatile Organic Compounds (VOC) shall be less than 25 tons per consecutive 12 month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6, (New Facilities: General Reduction Requirements), does not apply. Compliance with this limit shall be determined based upon the following criteria:

- (a) Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing

the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

- (b) The emission factors approved for use by IDEM, OAQ for polyester and vinyl resin shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, for open molding and filament winding, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.